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Agriculture

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Food and  
Consumer  
Service

Mountain Plains  
Region

Reply to  
Attn. of: SP-98-05

1244 Speer Blvd.  
Denver, CO  
80204-3581

Subject: School Meal Initiative (SMI) Monitoring  
Requirements

To: STATE AGENCY DIRECTORS - Colorado ED, Iowa,  
(Child Nutrition Programs) Kansas, Missouri ED,  
Montana OPI, Nebraska ED,  
North Dakota, South Dakota,  
Utah and Wyoming ED

This memorandum will serve to clarify what is required as part of the monitoring responsibilities imposed on State Agencies (SAs) to assess compliance of school meals, over the school week, with USDA's nutrition standards and the Dietary Guidelines. Some confusion has resulted in interpreting what constitutes a School Meals Initiative (SMI) review, and whether an on-site review is required as part of the SMI monitoring process.

With regard to the SMI, Section 210.19(a)(1) outlines the provisions for evaluating compliance with the nutrition standards. At a minimum, these evaluations shall be conducted once every 5 years. The regulations specifically require SAs to perform the following functions:

- for SFAs using nutrient-based menu planning, the SA shall assess the nutrient analysis for the last completed school week prior to the SMI review period to determine if the SFA is applying the methodology for Nutrient Standard Menu Planning (NSMP) or Assisted NSMP. Part of this assessment shall be an independent review of menus and production records to determine if they correspond to the analysis conducted by the SFA and if the menu, as offered, over a school week, corresponds to the appropriate nutrition standards as set forth in the program regulations; and
- for SFAs using food-based menu planning systems, enhanced or traditional; the SA shall conduct nutrient analysis on the menus served during the SMI review period to determine if the nutrition standards as set forth in the regulations for food-based menu planning

systems have been achieved. In addition, the SA may use the nutrient analysis performed by the food-based SFA, provided the analysis was done using USDA approved nutrient analysis software and the SFA followed USDA criteria for performing nutrient analysis. Finally, the SA may develop its own method for compliance review of food-based menu planning systems subject to USDA approval.

The program regulations do not explicitly state but do imply that an on-site evaluation would be a necessary component of the SMI monitoring process. In addition, USDA's prototype SMI monitoring forms and guidance make reference to the on-site SMI evaluation. Therefore, we believe that the intent of the SMI regulations is to include an on-site evaluation as a component in the SA's SMI monitoring activities. On-site SMI evaluations should be performed by SAs and may be done in conjunction with technical assistance visits; with Coordinated Review Effort on-site reviews; or separately.

In closing, we wish to reiterate that although the regulations do not require an on-site evaluation for SMI, good management controls and/or a prudent approach would dictate the inclusion of an on-site evaluation as a critical component to SA monitoring activities for SMI.

If you have questions, please contact our office.



ANN C. DEGROAT  
Regional Director  
Child Nutrition Programs

cc: CO Health, MT Health, MO Health, and WY Health